

From: Lavoie, Tegan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EB301A7C4E8F47EF898C1DAB1DCF4E3B-LAVOIE, TEG]
Sent: 3/11/2020 8:25:32 PM
To: Shine, Brenda [Shine.Brenda@epa.gov]
Subject: Huntsman
Attachments: dc16-002722.pdf

Hi Brenda,

I was able to find another version of Huntsman's permit online that includes allowable emissions. I compared what we modeled at proposal (yellow columns) to Huntsman's comments (green columns) to the allowable emissions in the permit (blue columns), shown below. Some main points:

Ex. 5 Deliberative Process (DP)

EMISSION_UNIT_DESCRIPTION	EMISSION_RELEASE_POINT_TYPE	HAP_CATEGORY_NAME	PROPOSAL, ACTUALS (tpy)	HUNTSMAN COMMENTS, ACTUALS (tpy)	PERMIT, ALLOWABLES (tpy)
ALKANOLAMINE FUGITIVES	7	Ethylene Oxide	0.0899	0.0242952	0.17
CARBONATE FUGITIVES	7	Ethylene Oxide	0.0207	0.01012695	0.07
D KETTLE FUGITIVES	7	Ethylene Oxide	0.4798	0.29177465	1.25
FLARE	2	Ethylene Oxide	0.0179	0.00018995	0.01
FLARE-D KETTLES & G KETTLES	2	Ethylene Oxide	0.6662	0.0005202	0.01
G KETTLE FUGITIVE	7	Ethylene Oxide	0.0375	0.01558005	0.12
PDA BUILDING VENT	7	Ethylene Oxide	0.0067	missing	0.0067
PLANNED MAINTENANCE STARTUP AND SHUTDOWN	7	Ethylene Oxide	0.0031	missing	0.0031
PONDS #4 & #5	7	Ethylene Oxide	0.7259	missing	0.7259
PUMP SEAL P-G-125	7	Ethylene Oxide	0.4565	missing	0.4565
RAILCAR UNLOADING FUGITIVE AREA	7	Ethylene Oxide	0.0605	0.0792519	0
RAILCAR UNLOADING FUGITIVE AREA	3	Ethylene Oxide	0.0097	0	0
SPECIALTY AMINES FUGITIVE AREA	7	Ethylene Oxide	0.0007	0.00061285	0.01
TANK FARM FUGITIVES	7	Ethylene Oxide	0.0784	0.0175896	0.33
VESSEL WASHOUTS	7	Ethylene Oxide	0.0158	missing	0.0158
JAUII FUGITIVE AREA	7	Ethylene Oxide	missing	0.00002045	0.01
JAUI Fugitive Area	7	Ethylene Oxide	missing	missing	0.02

JAUIII Fugitive Area	7	Ethylene Oxide	missing	missing	0.01
BCAREA Fugitive Area (MON/HON)	7	Ethylene Oxide	missing	missing	0.01
INCIN Fugitive Area (HON)	7	Ethylene Oxide	missing	missing	0.01
TC-17FUG	7	Ethylene Oxide	missing	missing	0.01
UNLOAD FUG	7	Ethylene Oxide	missing	missing	0.47
	WF	SUM (tpy)	2.67	0.44	3.72
	MON	SUM (tpy)	0.26	0.03	0.71
supplemented allowables using actuals when allowables not available					

Tegan N. Lavoie, PhD
OAR/OAQPS/SPPD/Refining and Chemicals Group
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711
Phone: (919) 541-5110 | Email: lavoie.tegan@epa.gov